



SALLY HUTTON
Mayor

WILLIAM N. HARRIS
Director

CITY OF RICHMOND

DEPARTMENT OF SANITATION
2380 LIBERTY AVENUE • RICHMOND, INDIANA 47374
PHONE (765) 983-7450 • FAX (765) 962-2669

To: Industrial User

On July 24, 1990, the U.S. EPA promulgated the Domestic Sewage Study (DDS) Rule, an amendment to the General Pretreatment Regulations (40CFR 403) that became effective on August 23, 1990. This rule contains two provisions requiring industries to report the substances that they discharge to the POTW if the substances would otherwise be hazardous waste under 40 CFR 261.

Please complete the enclosed Hazardous Waste Notification form and sign the appropriate certification statement at the bottom of the form. The completed and signed form may be faxed to (765) 962-2669, attention Pretreatment Coordinator, or mailed to address listed at the bottom on the form. You will need to use additional sheets of paper if you discharge more than one hazardous waste.

To assist in the understanding of the Rule and the reporting requirements, I have enclosed a copy of the 1991 Guidance to Indiana Industries for Reporting Discharges of Hazardous Waste To Publicly-Owned Treatment Works (POTWs) and a separate document titled Hazardous Waste Notification Requirement.

This form must be returned to be kept on file with the Richmond Sanitary District.
Thank you for your cooperation in this matter.

Sincerely,

Steve Swoveland
Pretreatment Coordinator
Richmond Sanitary District

HAZARDOUS WASTE NOTIFICATION REQUIREMENTS

On July 24, 1990, the Environmental Protection Agency (EPA) promulgated changes to the general pretreatment regulations (55 FR 30082). The changes affect both Publicly Owned Treatment Works (POTWs) and industrial users (IUs) of POTWs. One of the changes requires IUs to submit notification of hazardous wastes discharged to sewers. The following information provides a brief description of this requirement.

Who must notify: All IUs that discharge listed or characteristics RCRA hazardous waste to the Richmond Sanitary District's POTW (except as described below). Listed and characteristic wastes under RCRA are described in the Code of Federal Regulations (40 CFR part 261). Additionally, the Richmond Sanitary District requires that sections I, II a., and IV of the Hazardous Waste Notification form be completed even if no hazardous wastes are discharged to the sewer system.

Hazardous Waste Notification must be sent to:

- Local Sewerage Authority (Richmond Sanitary District)
- EPA Regional Waste Management Division Director, and
- State Hazardous Waste Authority

Waste covered by the notification

- Any discharge to the POTW of >15kg per calendar month of a RCRA hazardous waste, or a discharge of any quantity of acutely hazardous waste identified in 40 CFR 261.30(d) and 261.33(e), must be reported once.
- Any discharge to the POTW of <15kg of a RCRA hazardous waste during a calendar month need not be reported, **except** for the acutely hazardous waste identified in 40 CFR 261.30(d) and 261.33(e), must be reported once. A subsequent discharge of >15kg per calendar month or of any quantity of an acutely hazardous waste, must be reported once.
- Pollutants already reported under 40 CFR 403.12(b) and (e) (reporting requirements for categorical users) are not subject to this notification requirement.

Notification must contain:

- This notification must contain the following information
 - Name of the hazardous waste as set forth in 40 CFR part 261
 - EPA hazardous waste number
 - Type of discharge to the sewer (continuous, batch, or both)
 - A certification that the IU has a program in place to reduce the volume and toxicity of hazardous waste generated to the degree it has determined to be economically practical.

- If the IU discharges > 100 kg of hazardous waste per calendar month to the POTW, the one time notification must contain the following items of information, to the extent such information is known and readily available to the IU.
 - An identification of the hazardous constituents contained in the hazardous wastes.
 - An estimation of the mass and concentration of such constituents in the waste stream discharged during the calendar month in which the one-time report is made.
 - An estimate of the mass of constituents in the waste stream expected to be discharged during the 12 months following the notification.

How to count the volume of Hazardous Waste discharged: If a hazardous waste is mixed with non-hazardous process or non-process waste stream and the entire mixture is then discharged to the sewer, the volume of the entire waste stream containing hazardous waste is considered according to the RCRA “mixture rule” in 40 CFR part 261.3(a)(2)(iii). The effect of this rule is summarized as follows:

- **Characteristics wastes:** These wastes are classified as hazardous because they exhibit one of the hazardous characteristics identified in 40 CFR 261.20-261.24 (i.e. they are ignitable, corrosive, reactive, or toxic). If these wastes are mixed with non-hazardous materials and the mixture is then discharged to the sewer, the notification must be submitted only if the **entire mixture actually discharged** is > 15kg per calendar month and if the entire mixture discharged still exhibits the characteristic(s).
- **Listed wastes:** These are wastes that are classified as hazardous pursuant to being listed in 40 CFR 261.30-33. If these listed wastes are mixed with non-hazardous materials and then discharged to the sewer, the entire wastestream is considered hazardous and a notification must be submitted. Thus only if the entire waste stream containing the hazardous waste amounted to < 15kg per calendar month, would the exemption discussed apply.
- **Questionable wastes:** If an IU has any doubt about whether a mixture discharged to the sewer is hazardous, or if the user does not wish to perform any calculations which may be necessary under the mixture rule, 40 CFR 261.3(a)(2)(iii), the user should submit the one-time notification.

When the Notification must be submitted:

- The notification must be submitted within 180 days of August 23, 1990 (i.e., no later than February 23, 1991).
- IUs who commence discharging after August 23, 1990, must submit the notification no later than 180 days after the discharge of a hazardous waste.
- In the case of regulations under §3001 of RCRA new hazardous wastes, the notification must be submitted within 90 days of the effective date of such regulations.
- The notification need be submitted only once for each hazardous waste discharge, **except** when there will be a substantial change in the volume or character of the hazardous waste discharged (general because of a planned change to the user's facility or operations). In case of such a change, the user should notify the POTW in advance.
- The Richmond Sanitary District requires a one-time notification even if no hazardous waste is discharged to the sewer system.

For further information: General questions about the notification requirement should be directed to the Richmond Sanitary District's pretreatment office. Specific questions about determining if a waste is hazardous should be directed to the EPA RCRA Hotline at 800-424-9346.

Calculations to convert gallons to pounds.

1 U.S. Gallon of Water = 8.34 lbs

1 U.S. Gallon = 7.48 cubic feet

U.S. Gallons per month \div 7.48 = 100/cubic feet per month

(100/cubic feet per month) \times 0.006238 \times mg/L or ppm = pounds per 100/cubic feet per month

(pounds per 100/cubic feet) \times number of month = pounds per year discharged

0.006238 = conversion factor for 100/cubic feet to pounds